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8 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**FRESNO DIVISION**

9  
10 ALEJANDRO FLORES, ET AL.,

11 Plaintiffs,  
12 v.

13 DR. LORI BENNETT, ET AL.,  
14 Defendants.

Civil Action No:  
1:22-cv-01003-JLT-HBK

**STIPULATED MOTION FOR  
EXTENSION OF THE DEADLINE FOR  
THE JOINT STATUS REPORT**

16  
17 **STIPULATION**

18 IT IS HEREBY STIPULATED by the parties through their respective counsel of record as  
19 follows:

21 WHEREAS, on June 1, 2023, this Court stayed the proceedings of this case pending the  
22 resolution of Defendants appeal to the Ninth Circuit. ECF No. 54.

23 WHEREAS, the Court requested that the parties file a joint status report within thirty days  
24 of the issuance of the Ninth Circuit's mandate. ECF No. 54.

25 WHEREAS, the Ninth Circuit's mandate issued on August 25, 2023.

26 WHEREAS, on September 21, 2023, the Court granted the parties' Stipulated Motion for  
27 an Extension of the Deadline for the Joint Status Report. ECF No. 58.

28 WHEREAS, the parties' joint status report is now due on November 27, 2023.

1 ECF No. 58.

2 WHEREAS, the parties remain actively engaged in settlement negotiations which would  
3 eliminate the need for additional motion practice or discovery.

4 NOW THEREFORE, the parties hereby request that the Court extend the November 27  
5 deadline for the joint status report set in ECF No. 58 by 60 days, to be due on January 26, 2024.

6 Dated: November 22, 2023

7 FOUNDATION FOR INDIVIDUAL  
8 RIGHTS AND EXPRESSION

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10 By: /s/ Daniel M. Ortner  
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24 Dated: November 22, 2023

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